UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-40036-TSH
)	
)	
VINCENT KIEJZO)	

ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE DISCOVERY MOTION(S)

The defendant, Vincent Kiejzo, respectfully requests that the March 29, 2021 deadline to file discovery motions be extended, and that he be permitted to file a discovery motion on March 31, 2021. As grounds, undersigned counsel states that on or about March 17 and 18, 2021, she received some responsive discovery from the government. She has since been diligently drafting a motion to compel the discovery which the government has declined to produce, but requires additional time to submit a comprehensive pleading. Counsel conferred with AUSA Kristen Noto about this request for an extension, and understands that the government assents to the defendant's filing on March 31, 2021.

VINCENT KEIJZO By His Attorney,

/s/ Sandra Gant
March 26, 2021
Sandra Gant
BBO # 680122
Federal Public Defender Office
Temporary Mailing Address:
P.O. Box 51268
Boston MA 02205
Physical Address:
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on March 29, 2021.

/s/ Sandra Gant Sandra Gant